

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION

UNITED STATES OF AMERICA)	
)	CRIMINAL NO. 2:18cr76
v.)	
)	
KHALIL NAIM,)	
)	
Defendant.)	

GOVERNMENT'S MOTION TO GRANT DEFENDANT ADDITIONAL
ONE-LEVEL DECREASE FOR ACCEPTANCE OF RESPONSIBILITY

Now comes the United States of America, by its undersigned counsel, pursuant to U.S.S.G. § 3E1.1(b), and moves the Court to grant the defendant an additional one-level decrease in the offense level for acceptance of responsibility, in that the defendant has assisted authorities in the investigation and prosecution of his own misconduct by timely notifying authorities of his intention to enter a plea of guilty, thereby permitting the government to avoid preparing for trial and permitting the government and the court to allocate their resources efficiently.

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By: _____/s/
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CERTIFICATE OF SERVICE

I hereby certify that on the 19th day of June 2018, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to counsel of record who are users of the CM/ECF system.

/s/

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